

Robert A. Smejkal  
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Attorney for Paul Sandland, Trustee of the Paul Sandland Revocable Trust dated 12/19/2007; Aldetay Investments, LLC; Pensco Trust Company Custodian fbo Marvin Berkman IRA; Equity Trust Company Custodian fbo Gregory L. Knecht IRA; Marvin Berkman, Trustee of the Marvin Berkman Living Trust dated January 25, 2007; and Maryann Sorric

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re:	)	Case No. 18-30949-dwh11
	)	
SAGE GROUP, LLC,	)	STATEMENT IN SUPPORT OF MOTION FOR
	)	RELIEF FROM AUTOMATIC STAY
Debtor.	)	

Paul Sandland, Trustee of the Paul Sandland Revocable Trust dated 12/19/2007; Aldetay Investments, LLC; Pensco Trust Company Custodian fbo Marvin Berkman IRA; and Equity Trust Company Custodian fbo Gregory L. Knecht IRA (the “Sandland Creditors”); and Marvin Berkman, Trustee of the Marvin Berkman Living Trust dated January 25, 2007 and Maryann Sorric (the “Berkman Creditors”) by and through their attorney, Robert A. Smejkal, hereby support the Motion for Relief from Automatic Stay filed March 30, 2018 by Western Land Holding I, LLC and Pacific Northwest Land Development, LLC as Document No. 14 (the “Motion for Relief from Automatic Stay”).

The Sandland Creditors are the beneficiaries of a first Trust Deed and have obtained a Limited Judgment and Decree of Foreclosure and a Supplemental Limited Judgment regarding the land and improvements described as Lot 54, VILLEBOIS VILLAGE CENTER NO. 2, in the City of Wilsonville, County of Clackamas and State of Oregon (Phase I Property).

The Berkman Creditors are the beneficiaries of a first Trust Deed and have obtained a Corrected Limited Judgment and Decree of Foreclosure and Supplemental General Judgment regarding the land and improvements described as Lot 74, VILLEBOIS VILLAGE CENTER NO. 2, in the City of Wilsonville, County of Clackamas and State of Oregon (Phase II Property).

The Sandland Creditors and the Berkman Creditors concur with each of the allegations contained in the Motion for Relief from Automatic Stay and urge the Court to grant the relief requested in the Motion for Relief from Automatic Stay.

Dated April 23, 2018.

ROBERT A. SMEJKAL, P.C.

/s/ Robert A. Smejkal

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Robert A. Smejkal, OSB #783824  
Attorney for Sandland Creditors and Berkman  
Creditors

## CERTIFICATE OF SERVICE

I, Robert A. Smejkal, on April 23, 2018, I caused to be served, by first-class mail with postage prepaid and placed in a sealed envelope, addressed as shown below, in the U.S. Mail at Eugene, Oregon, a full and true copy of the attached Statement in Support of Motion for Relief from Automatic Stay on the following:

Sage Group, LLC  
16869 SW 65<sup>th</sup> Avenue, #303  
Lake Oswego, OR 97035

and by CM/ECF using the Court's database on the ECF Participants

ROBERT A. SMEJKAL, P.C.

/s/ Robert A. Smejkal

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Robert A. Smejkal, OSB #783824  
Attorney for Sandland Creditors and Berkman  
Creditors